

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

James Joseph Conaway : Case No. 20-12378-AMC

Debtor(s)

ANSWER TO MOTION OF RELIEF FROM THE AUTOMATIC STAY OF
Rocket Mortgage, LLC f/k/a Quicken Loans, LLC
f/k/a Quicken Loans Inc.
AND CERTIFICATE OF SERVICE

Counsel has been informed that the Debtor is recently
deceased and is requesting that the current payoff to be supplied
as Debtor had wanted to sell the property.

WHEREFORE, Debtor respectfully requests this Honorable Court
deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen
David M. Offen Esquire
Attorney for Debtor

Dated: October 26, 2023

A copy of this Answer is being served on MARK A. CRONIN,
Esquire and the Chapter 13 Trustee.